

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,)	COURT CASE NO
)	
Plaintiff)	
)	
vs.)	
)	
Quddusa L Anderson ,)	FELONY COMPLAINT
Eimbari Kemet)	
)	
)	
Defendant)	DA CASE NO 2012-00-0004434

The undersigned is informed and believes that:

COUNT 1

On or about September 9, 2011 through November 7, 2011, in the above named judicial district, the crime of **SECOND DEGREE BURGLARY, in violation of PENAL CODE SECTION 459**, a felony, was committed by Quddusa L Anderson and Eimbari Kemet, who did enter an unoccupied residence located at 6988 Walker Ct., with the intent to commit larceny and any felony.

COUNT 2

On or about September 9, 2011 through November 7, 2011, in the above named judicial district, the crime of **FORGERY, in violation of PENAL CODE SECTION 470(d)**, a felony, was committed by Quddusa L Anderson and Eimbari Kemet, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, a lease agreement, knowing the same to be false, altered, forged and counterfeited.

COUNT 3

On or about September 9, 2011 through November 7, 2011, in the above named judicial district, the crime of **GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a)**, a felony, was committed by Quddusa L Anderson and Eimbari Kemet, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit cash in the amount of \$ 2,500, the property of Freddie Mac Mortgage.

COUNT 4

On or about September 9, 2011 through November 7, 2011, in the above named judicial district, the crime of **CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1)**, a felony, was committed by Quddusa L Anderson and Eimbari Kemet, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Grand Theft, in violation of Section 487 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s)s committed the following overt act and acts at and in the County of San Bernardino:

1. Quaddusa Anderson falsley represents that she is the legimate tenant of a foreclosed property by turning on the utilities in her name.
2. Anderson trespasses and illegally occupies the residence.
3. Signs are posted to not enter and that the residence is occupied.
4. The locks are changed to prevent the lawful owners from entering.
5. Application is sent to Freddie Mac requesting "cash for keys" under representation that Anderson is a legitimate tenant. A false lease agreement is presented to Freddie Mac between Anderson and Real Estate Solutuions, which is suspect Kemet.
6. A check for \$ 2,500 is sent to Anderson from Freddie Mac and is endorsed and cashed by both Anderson and Kemet.

COUNT 5

On or about August 1, 2011 through November 17, 2011, in the above named judicial district, the crime of **SECOND DEGREE BURGLARY, in violation of PENAL CODE SECTION 459**, a felony, was committed by Quddusa L Anderson and Eimbari Kemet, who did enter an unoccupied residence located at 7401 Saintsbury Pl., with the intent to commit larceny and any felony.

COUNT 6

On or about August 1, 2011 through November 17, 2011, in the above named judicial district, the crime of **FORGERY, in violation of PENAL CODE SECTION 470(d)**, a felony, was committed by Quaddusa L Anderson and Eimbari Kemet, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, a lease agreement, knowing the same to be false, altered, forged and counterfeited.

COUNT 7

On or about August 1, 2011 through November 17, 2011, in the above named judicial district, the crime of **GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 487(a)**, a felony, was committed by Quaddusa L Anderson and Eimbari Kemet, who did unlawfully take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit cash in the amount of \$ 7,500, the property of Bank of America.

COUNT 8

On or about August 1, 2011 through November 17, 2011, in the above named judicial district, the crime of **CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1)**, a felony, was committed by Quaddusa L Anderson and Eimbari Kemet, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Grand theft, in violation of Section 487 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of San Bernardino:

1. Quaddusa Anderson falsley represents that she is the legimate tenant of a foreclosed property by turning on the utilities in her name.
2. Anderson trespasses and illegally occupies the residence.
3. Signs are posted to not enter and that the residence is occupied.
4. The locks are changed to prevent the lawful owners from entering.

5. Application is sent to Bank of America requesting “cash for keys” under representation that Anderson is a legitimate tenant. A false lease agreement is presented to Bank of America between Anderson and Real Estate Solutions, which is suspect Kemet.
6. A check for \$ 7,500 is sent to Anderson from Bank of America and is endorsed and cashed by both Anderson and Kemet.

COUNT 9

On or about November 29, 2011 through January 17, 2012, in the above named judicial district, the crime of **SECOND DEGREE BURGLARY, in violation of PENAL CODE SECTION 459**, a felony, was committed by Quddusa L Anderson and Eimbari Kemet, who did enter an unoccupied residence, located at 7675 Hitching Post, with the intent to commit larceny and any felony.

COUNT 10

On or about November 29, 2011 through January 17, 2012, in the above named judicial district, the crime of **FORGERY, in violation of PENAL CODE SECTION 470(d)**, a felony, was committed by Quddusa L Anderson and Eimbari Kemet, who did, with the intent to defraud, falsely make, alter, forge and counterfeit, utter, publish, pass and attempt to offer to pass, as true and genuine, a lease agreement, knowing the same to be false, altered, forged and counterfeited.

COUNT 11

On or about November 29, 2011 through January 17, 2012, in the above named judicial district, the crime of **ATTEMPTED GRAND THEFT OF PERSONAL PROPERTY, in violation of PENAL CODE SECTION 664/487(a)**, a felony, was committed by Quddusa L Anderson and Eimbari Kemet, who did unlawfully attempt to take money and personal property of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit cash, the property of Bank of America.

COUNT 12

On or about November 29, 2011 through January 17, 2012, in the above named judicial district, the crime of **CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1)**, a felony, was committed by Quaddusa L Anderson and Eimbari Kemet, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Grand theft, in violation of Section Penal Code 487 of the penal code Code, a felony; that pursuant to and for the purpose of carrying out the objects and purposes of the aforesaid conspiracy, the said defendant(s)s committed the following overt act and acts at and in the County of San Bernardino:

1. Quaddusa Anderson falsley represents that she is the legimate tenant of a foreclosed property by turning on the utilities in her name.
2. Anderson trespasses and illegally occupies the residence.
3. Signs are posted to not enter and that the residence is occupied.
4. The locks are changed to prevent the lawful owners from entering.
5. Application is sent to Bank of America requesting "cash for keys" under representation that anderson is a legitimate tenant. A false lease agreement is presented to Bank of America between Anderson and Real Estate Solutuions, which is suspect Kemet.

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NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 1054.5.(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 12 COUNT(S).

Executed at San Bernardino, California, on January 30, 2012.

M. Landrum

M. Landrum

DECLARANT AND COMPLAINANT

Agency: District Attorney B of I-REF

Prelim Est. 00:00

Defendant	Birth Date	Booking No.	CII No.	NCIC
Quddusa L Anderson	09/05/1973		A101750905	
Eimbari Kemet	06/05/1966		A08936454	